

REMARKS/ARGUMENTS

Claims 1-2 and 4-12 remain in this application. Claims 1, 4,5,6,8, and 12 have been amended to more clearly specify Applicants' invention. Claims 2, 7, 9-11 remain unchanged.

Rejection of Claims 1-2 and 4-12 under 35 U.S.C. 103(a) as being unpatentable over US patent no. 5,570,366 (Baker et al) in view of US patent no. 6,847,620 (Meier):

Applicants respectfully request reconsideration of the rejection of Claims 1-2 and 4-12 under 35 U.S.C. 103(a) as being unpatentable over US patent no. 5,570,366 (Baker et al) in view of US patent no. 6,847,620 (Meier) as herein amended.

The examiner rejects claims 1 and 8 on the grounds that Baker et. al. teaches substantially the same except for the limitations of using IGMP messages for populating the tables. The examiner further goes on to state that give the Meier reference of merging multiple VLANs into a multicast group gives a basis for obviousness.

Applicant respectfully disagrees with the examiner. Firstly, Meier is combining multiple VLANs into a multicast group. Applicant's claimed invention assigns multicast groups to a segment of wireless subscribers that could be associated with a number of Access Points in the system. Meier is simply combining common traffic flows into a multicast group. Applicant's claimed invention uses a multicast group for establishing a group membership across the wired network and any number of wireless LANs contained in the system. Applicants are not doing this for a transport of common VLAN message tags across a wired network. Rather, Applicants

invention provides for the establishment of a common group membership across the system. Applicant submits that Applicant's use of multicast groups mapped to groups of subscribers and tagged according to multicast groups is not obvious by combining materials in these two cited patents. In order to use the concept of VLANs to a multicast group each group member in Applicant's application would require its on VLAN. This is impractical and not what is intended here.

Secondly, the subtle difference in claim 8 allows for extra intelligence in the messaging that allows source unit initiating a group call can request that the transmission be re-transmitted over the wireless link even though there may not be any other units their to receive the message. This would be a form of acknowledgement that the message actually received the AP. This concept is in no way anticipated by either patent cited by the examiner.

Additionally in Baker, the intention is to forward messages received at an access point from the wired network to the wireless network only if there are members associated with that multicast group. Applicant's invention recites a method for an access point to receive a message from either the wired or wireless port and retransmit that message only if there is at least one group member other than the one that initially transmitted the message wirelessly associated with the access point. Refer to figure 8 in Baker. Baker only seems to cover the case where multimedia traffic is sourced form a device or server on the wired LAN to multicast group members on the wireless link. Applicant's invention can route messages whether they are sourced from a wireless device associated with the access point or a from a network device. Applicant's invention controls how APs in a system control the broadcast of group traffic from

one wireless device either associated with the current AP or another AP in the network and broadcast as an IP multicast message over the wired network.

In the rejection of claim 5 the examiner states that using Inter-Access Point Protocol messages to update mobile VLAN could have been used to motivate a person of ordinary skill in the art to realize our claim 5. Again, the step of using an updating a table of multiple VLANs to a multicast group is not our concept of system group membership to a multicast group.

In the rejection of claim 12, the examiner states that the rebroadcast request is similar to the filter enable and filter disable in Baker et. al. Applicant's invention uses this concept for the purpose of allowing an originating source unit to have the packet rebroadcast over the wireless media to allow for a form of wireless multicast ack over the wireless media. Applicant's invention does not seek to disable any filters on the AP. In fact, when a multicast packet is received at the AP from the wired network the presence table will still be used to determine if there are any group members currently associated with that AP. There is no filtering disable described here at all. Applicant's rebroadcast request is only for a wireless subscriber to request that the AP rebroadcast the packet so that it can use it as an acknowledgement that the packet reached the AP and not for any multicast filtering based on layer 3 multicast scope rules. The rebroadcast request does not apply to the wired port. The multicast group traffic is always rebroadcast out this port in our application.

For the foregoing reasons, applicants respectfully request that the above rejections be withdrawn.

Inasmuch as this amendment distinguishes all of the applicants' claims over the prior art references, for the many reasons indicated above, passing of this case is now believed to be in order. A Notice of Allowance is earnestly solicited.

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

If the Examiner believes that there are any informalities which can be corrected by Examiner's amendment, or in the event that the Examiner deems the present application non-allowable, a telephone call to the undersigned at (954) 723-6449 is respectfully solicited.

Authorization is hereby given to charge any fees, or credit overpayment necessitated by actions taken herein to Deposit Account 50-2117.

Respectfully submitted,

August 24, 2006

Motorola, Inc.
8000 West Sunrise Boulevard
Law Department – MD1610
Plantation, Florida 33322
Customer Number: 24273

By: /Randi L. Karpinia/
Randi L. Karpinia
Attorney of Record
Reg. No.: 46,148
Tel: 954-723-6449
Fax: 954-723-3871
E-mail: docketing.florida@motorola.com